

JUL 07 1989

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The Boots Company, PLC TDG Building D6 Nottingham, NG2 3NA United Kingdom

Attention: W.C. Guthrie

Gentlemen:

Subject: Myacide AS Plus EPA Registration No. 33753-5 Your Application Dated October 28, 1988 FPA Received Date November 7, 1988

The proposed amendment referred to above, to add additional end-uses, is acceptable provided that you make the following label changes:

- 1. Delete the word "milk."
- Delete the following statement from the "Note to Physician" section:

Measures against circulatory shock, respiration depression and convulsion may be needed.

A stamped copy of the labeling is enclosed for your records.

Submit five (5) copies of your final printed labeling before you release the product for shipment.

If this condition is not complied with, the registration will be subject to cancellation in accordance with section 6(e) of the Federal Insecticide, Fungicide, and Rodenticide Act. Your release for shipment of the product bearing the amended labeling constitutes acceptance of this condition.

CONCURRENCES									
SYMBOL									
DATE					*******			*********************	

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If you have any questions concerning this letter, please contact Karen M. Leavy at (703) 557-3966.

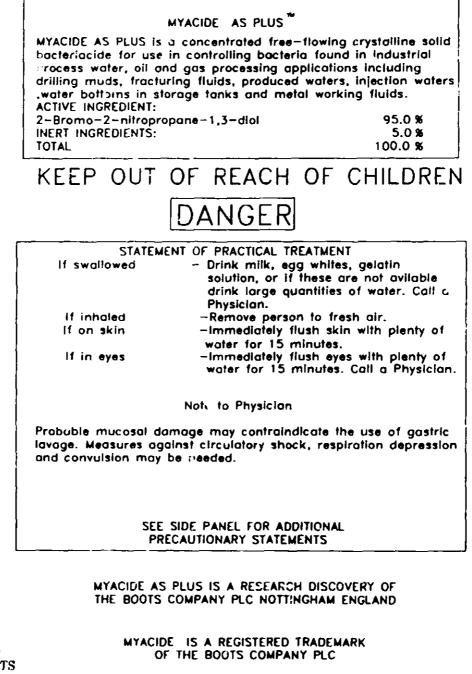
Sincerely yours, John H. Lee

Product Manager (1) Antimicrobial Program Branch Registration Division (H7505C)

Enclosure

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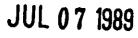
MYACIDE AS PLUS



EPA REG NUMBER 33753-5 EPA E T NUMBER 33753-EN-1

NET CONTENTS 25 Kg

ACCEPTED with COMMENTS in EPA Letter Dated:



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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive.Causes eye and skin damage. Do not get in eyes, on skin or clothing. May be fatal if swallowed. Avoid breathing dust. Wear goggles or face shield and rubber gloves when handling.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidancs, contact your State Water Board or Regional Office of the EPA. Do not contaminate water by cleaning of equipment or disposal of waste.

STORAGE AND DISPOSAL Do not contaminate water, food, or feed by storage or disposal. Keep away from heat.

PESTICIDE DISPOSAL:

Pesificide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to Inbel Instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidence.

CONTAINER DISPOSAL:

Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Triple rinse (or equivalent) then offer drum for recycling or reconditioning, or puncture. Dispose of drum and liner in a sanitary landfill, or by incineration, if allowed by State and local authorities. If burned, stay out of smoke.

ACCUPTED with COMMENTS in EPA Latter batch

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DIRECTIONS FOR USE

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IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELLING

INDUSTRIAL RECIRCULATING WATER COOLING TOWERS AND EVAPORATIVE CONDENSERS

For the control of slime-forming bacteria and algae in industrial recirculation cooling towers and evaporative condensers METHOD AND LOCATION

MYACIDE AS PLUS may be dosed as the solid directly into the sump or basin or it may be added to the cooling water return at a suitable point. The MYACIDE AS PLUS should be added at a point where there is adequate flow or turbulance to ensure quick dissolution (e.g. the pump outlet from the tower sump). FREQUENCY

MYACIDE AS PLUS may be slug dosed once or twice weekly as a normal routine. Where contamination is heavy, more frequent shock dosing may be required.

QUANTITY - INITIAL AND MAINTAINANCE

MYACIDE AS PLUS should be shock dosed at between 25g and 100g per cubic meter (0.21-0.84 lbs/1000 gallons) depending on the condition of the tower, the quality of the raw water input and the amount of bleed off.

WATERFLOOD

Inhibit growth of anaerobic and aerobic bacteria in all waterflood base fluids used in the recovery of oil and gas from reservoirs. METHOD AND LOCATION

MYACIDE AS PLUS can be added as a dry product or pre-dissolved in any base fluid, or injected directly at the well head. FREQUENCY

MYACIDE AS PLUS should be added continuously to waterflood fluids or slug dosed depending on the bottom hole tempreture and fluid chemistry.

QUANTITY - INITIAL AND MAINTENANCE

MYACIDE AS PLUS may be added at the rate of 25-100 ppm with coloring to 0.036 lbs. per barrel) depending on the quality In EP. 164 The base fluid.

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PRODUCED WATER

To inhibit the growth of slime-forming or corrosion-inducing sulfate reducing bacteria in formation water produced by wells together with oil or gas.

METHOD AND LOCATION

MYACIDE AS PLUS may be used as the solid or pre-dissolved in a quantity of warm water or alcohol, then injected into the water-containing oil or gas stream at any convenient point. It should be injected in slug doses, not as a continuous feed. FREQUENCY

Depending on severity and rapidity of contamination MYACIDE AS PLUS should be slug dosed from once a week to once a month.

QUANTITY - INITIAL AND MAINTAINANCE

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Slug dose 50 - 100g/cubic meter (0.018-0.036 lbs per barrel).

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FRACTURING FLUIDS 337535

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Reduces bacterial contamination and degradation of Fracturing Gels and Fluids used as well stimulants in the oil and gas industry.

METHGD AND LOCATION

MYACIDE AS PLUS may be added during pre-mixing of the fracturing fluid or (in the case of direct mix/injection systems) an aqueous solution may be added by direct injection at the head during the fracturing procedure.

FREQUENCY

MYACIDE AS PLUS should be used for each fracturing operation to ensure best results.

QUANTITY - INITIAL AND MAINTAINANCE

MYACIDE AS PLUS should be added at a rate of 50-100g per cubic meter (0.42-0.84 lbs per 1000 gallons) depending on the quality of the make up water.

INDUSTRIAL PROCESS WATER

For the effective control of bacterial and algal growth in Industrial Process Water including closed circuit machine cooling (injection molding, etc.) and stored (non-potable) water.

To reduce the biofouling of pipework, heat exchangers, condenser jubes and minimise microbially produced corrosion.

METHOD AND LOCATION

Dosing should be carried out into the sumpztank of the process water system. Shock dosing is preferred. It is not necessary to dilute MYACIDE AS PLUS concentrate prior to dosing.

MYACIDE AS PLUS can also be used as an intermittent flush treatment during regular maintenance cleaning of tanks and equipment.

FREQUENCY

In open systems shock dosing should be carried out on a once weekly to once monthly basis depending on the degree of contamination. In closed circ it systems less frequent dosing (once or twice monthly) would be sufficient.

QUANTITY - INITIAL AND MAINTENANCE

Dosing should be carried out to give an initial concentration of 50 ppm. (50 g/cubic meter or 0.42 lbs/1000 gallons). When the above treatment has been successful, dosing can be lowered to a minimum of 10 ppm. MYACIDE AS PLUS (10 g/cubic meter or 0.08 lbs/1000 gallons). For intermittent treatment of industrial process waters during routine maintenance MYACIDE AS PLUS should be used at 100 ppm. (100 g/cubic meter or 0.84 lb/1000 gallons) and a contact time of at least one hour.

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WATER BOTTOMS IN OIL OR TRANSPORTATION TANKS

For effective control of bacterial contamination in water bottoms in crude and refined hydrocarbon storage systems Above and below ground storage tanks and large marine systems are all suitable for treatment.

METHOD AN'D LOCATION

MYACIDE AS FLUS may be pre-dissolved in warm water to give up to a 20% concentrate. This concentrate can be injected directly into the water bottom or may be sprayed over the surface of the hydrocarbon phase and allowed to percolate through.

Using a carrier solvent addition of MYACIDE AS PLUS into the hydrocarbon phase will provide long term water concentrations by a diffusion process.

FREQUENCY

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Direct addition to the water phase should be carried out every 30 - 60 days. Using a carrier solvent for addition to the hydrocarbon phase will provide longer term water concentrations depending on frequency of hydrocarbon movement, draining of water bottom and other factors.

QUANTITY - INITIAL AND MAINTENANCE

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MYACIDE AS PLUS should be dosed at a rate which will achieve concentrations of 50 - 100 ppm. In the aqueous phase. When using a carrier solvent, higher initial concentrations may be used to allow diffusion into the aqueous phase.

PIL _INE MAINTENANCE

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METHOD AND LOCATION

MYACIDE AS PLUS may be pre-dissolved in warm water or in a carrier solvent to give up to a 20% concentrate. This concentrate can be injected directly into the pipeline or may be added to the hydrocarbon phase. Using carrier solvent addition of MYACIDE AS PLUS directly into the hydrocarbon phase will produce long term water phase concentrations by a diffusion process.

FREQUENCY

Carrier additions will vary with the degree of contamination and volume of fluids through the pipeline. Slug treatments are recommended and can vary from daily to monthly control growth.

QUANTITY - INITIAL AND MAINTENANCE

MYACIDE AS PLUS should be dosed at a rate which will achieve concentrations of 25-200 ppm in the aqueous phase. When using a carrier solvent, higher initial concentrations may be used to allow diffusion into the aqueous phase. Dose will depend on the volume of oil or crude and the expected water fraction.

DRILLING FLUIDS AND WORKOVER AND COMPLETION FLUIDS

For use in oil and gas well drilling muds, and brines, inhibiting growth of cellulolytic, slime forming or sulfate reducing bacteria.

METHOD AND LOCATION

MIACIDE AS PLUS may be used as the solid or pre-dissolved in a quantity of warm water, then dosed directly into the mud or brine.

FREQUENCY

A single slug dose once to three times each 24hrs. Dosing may be le's frequent where the contamination is low.

QUANTITY - INITIAL AND MAINTENANCE Each slug dose should be 0.018 to 0.036 pounds per barrel total mud volume.

WELL SQUEEZE FLUIDS

For the effective control of aerobic and anaerobic bacteria in squeeze fluids and downhole well bore areas.

METHOD AND LOCATION

MYACIDE AS PLUS may be added during pre-mixing of the well squeeze fluid or (in the case of direct mix injection systems) on aqueous solution may be added by direct injection at the well head during the well squeeze procedure.

FROUENCY

MYACIDE AS PLUS should be used for each well squeeze operation to ensure best results.

QUANTITY - INITIAL AND MAINTENANCE

MYACIDE AS FLUS should be added at a rate of 25-200 g, per cubic meter (0.21-1.68 lbs./1000 gallons) depending on the quality of the makeup water.

METALWORKING FLUIDS

MYACIDE AS PLUS is recommended for use in soluble oils, semi-synthetic, and synthetic fluids. It should be added directly to the sump (with agitation) or pre-dissolved in water and added as a solution. A dose of 250ppm is recommended for initial treatment, higher levels up to 1000 ppm, but no greater for fouled systems. After addition of MYACIDE AS PLUS, the system should be circulated for about one hour before shut-down. IN DILUTED FLUIDS

A concentration of 250 to 1000 ppm of MYACIDE AS PLUS in the fluid is sufficient to control gross microbial growth. For example, add 0.5 lb of MYACIDE AS PLUS to 1000 lb of fluid to obtain a dose level of 500 ppm in the fluid.

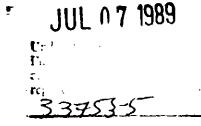
MAINTENANCE DOSAGE

Add 100-200 ppm of MYACIDE AS PLUS to maintain control of the system.

IN CONCENTRATES

MYACIDE AS PLUS may be incorporated in metalworking fluid concentrate by the manufacturer. However, the manufacturer should determine the storage stability of MYACIDE AS PLUS in the concentrate to ensure that incompatability will not affect its efficacy. The amount to be incorporated will depend on the dilution factor recommended for the concentration.

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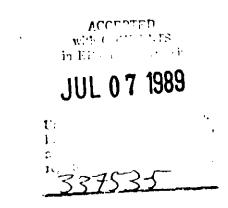
INJECTION FLUIDS

For the control of contamination and corrosion from bacterial sources in fluids/waste fluids that are disposed of through injection into an approved well following approved guidelines. METHOD AND LOCATION

MYACIDE AS PLUS can be added as a dry product or pre-dissolved in each volume of fluid prior to injection.

FREQUENCY

MYACIDE AS PLUS should be added at a rate of 50 - 100 ppm (0.018 to 0.036 lbs per barrel) based on the water percent of the injection fluid.



ENHANCED OIL RECOVERY (EOR) FLUIDS

For the effective control of bacterial growth and eliminating degradation of EOR gels and fluids used in the oil and gas industry.

METHOD AND LOCATION

MYACIDE AS PLUS can be added during mixing as a dry product or pre-dissolved or added by injection during the EOR procedure. FREQUENCY

MYACIDE AS PLUS should be added throughout the EOR operation. QUANTITY - INITIAL AND MAINTENANCE

MYACIDE AS PLUS should be added at the rate of 50 - 100 ppm (0.018 to 0.036 lbs. per barrel) depending on the quality of the make up water.